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Attorneys for Plaintiff, TESLA, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

TESLA, INC.,

Plaintiff,

v.

MATTHEWS INTERNATIONAL  
CORPORATION, a Pennsylvania corporation,

Defendant.

Case No. 5:24-cv-03615-EJD

**DECLARATION OF ROBERT  
COURTNEY IN SUPPORT OF TESLA,  
INC.'S OPPOSITION TO DEFENDANT'S  
MOTION TO COMPEL ARBITRATION**

Date: October 3, 2024  
Time: 9:00 a.m.  
Place: Courtroom 4, 5th Floor  
Judge: Hon. Edward J. Davila

**REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED**

1 I, Robert Courtney, hereby declare as follows:

2 1. I am a principal at the law firm of Fish & Richardson P.C., counsel of record in this  
3 action for Plaintiff Tesla, Inc. ("Tesla"). I am a member of the Bar of the State of California. I have  
4 personal knowledge of the matters stated in this declaration and would testify truthfully to them if  
5 called upon to do so. I submit this Declaration in support of Tesla's Opposition to Matthews  
6 International Corporation's Motion to Compel Arbitration.

7 2. Attached as Exhibit 1 is a true and correct copy of a February 12, 2021 email from  
8 Greg Babe, Matthews, to Roshan Shankar, Tesla.

9 3. Attached as Exhibit 2 is a true and correct copy of [REDACTED]  
10 [REDACTED].

11 (FILED UNDER SEAL)

12 I declare under penalty of perjury under the laws of the United States that the foregoing is  
13 true and correct.

14 Executed this 9<sup>th</sup> day of July, 2024 at Washington, D.C.

15  
16 /s/ Robert Courtney  
17 Robert Courtney  
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